

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

LaKrystal Coats, as Personal )	Civil Action No. 1:17-cv-02930-TLW
Representative of the Estate of Demetric )	
Cowan, )	
Plaintiff, )	
)	
v. )	<b>VOIR DIRE ON BEHALF OF</b>
)	<b>DEFENDANTS</b>
Sidney Montgomery, in his individual )	
capacity; Roy Murray, in his individual )	
capacity; and Pamela Osborne, in her )	
individual capacity, )	
)	
Defendants. )	
_____ )	

Defendants move that the Court, at the call of the case, inquire of the juror venire as follows:

1. Is there any member of the jury panel who is familiar with the facts involved in this case?

2. Are you or is any member of your family acquainted with any of the attorneys involved in this case or their law firms, socially, professionally, or otherwise?

A. The plaintiff is represented by:

- 1) Elizabeth Franklin-Best of Elizabeth Franklin-Best, P.C. of Columbia, South Carolina; and
- 2) E. Charles Grose, Jr. of The Charles Grose Law Firm, LLC of Greenwood, South Carolina.

B. The defendants are represented by:

- 1) Russell W. Harter, Jr. and Carly H. Davis of the firm Chapman, Harter & Harter, P.A., of Greenville, South Carolina; and

2) David Morrison and Robert Cooper of Morrison Law Firm, LLC of  
Columbia, South Carolina.

3. Is there any member of the jury panel who themselves, their spouses, or a close family member knows, works with, and/or has any relationship whatsoever with any of the parties, attorneys, or witnesses in this case? Potential witnesses are as follows:

- a. Sidney Montgomery
- b. Roy Murray
- c. Pamela Osborne
- d. Lonnie Smith
- e. Lt. Linda Butler
- f. Brett Woodard, M.D.
- g. Kim Collins, M.D.
- h. Kevin Jones
- i. Ray Pope
- j. Daniel Cardarelli
- k. Steven Phillip Nichols
- l. Brandon White
- m. Carmen Tucker
- n. Adam Slizewski
- o. James B. Tallon
- p. Jovonya Key
- q. Roy Cox, Jr., Coroner
- r. Danny Byrd
- s. Deputy Coroner Derrick Rash
- t. Charlie Boseman
- u. Rodney Free
- v. Misti Hawkins
- w. Jeremy Baker
- x. Duane Joseph Terry
- y. LaKrystal Coats
- z. Rommay Cowan
- aa. Audrey Ann Moses
- bb. Lyndia Belcher
- cc. Kelashia Cowan
- dd. De'Quiashia Cowan
- ee. Demetric Cowan, Jr.
- ff. LaDreavis Cowan
- gg. James Aiken

If yes, please describe generally the nature of your involvement, knowledge, acquaintance,

and/or association with such attorney, party or potential witness.

4. Is there any member of the jury panel who feels that any time an inmate or detainee dies while he or she is in a jail or detention facility, that the facility or its officers are liable for damages?

5. Have you or any member of your family, to your knowledge, ever been accused, charged or arrested for resisting arrest?

6. Have you or any member of your family, to your knowledge, ever been accused, charged or arrested for disorderly conduct?

7. Have you or any member of your family, to your knowledge, ever been accused, charged or arrested for Possession with the Intent to Distribute?

8. Have you or any member of your family, to your knowledge, ever been accused, charged or arrested for Possession of Marijuana?

9. Have you, a member of your immediate family, or a close friend ever been diagnosed with or treated for addiction to cocaine, ecstasy, marijuana or alcohol?

10. Have you ever experienced, or seen another person go through, detoxification or "detoxing" from drugs or alcohol? If so, describe when and where that occurred.

11. Do you believe a person should be free to use drugs such as cocaine and ecstasy even though there may be laws that say otherwise?

12. Have you, a member of your immediate family, or a close friend ever had what you consider to be a bad experience with the Greenwood County Sheriff's Office? If so, what were the circumstances?

13. Have you or any member of your immediate family, or close friends, ever been detained or booked into the Greenwood County Detention Center?

14. Have you or any member of your family had any experience in dealing with problems,

legal, medical, or otherwise, that related to the use or abuse of controlled substances?

15. Have you or any member of your immediate family, or close friends, ever been detained in any municipal, county, state, or federal detention center for any reason? If so, please answer the following questions;

- (a) Who was detained?
- (b) At what institution?
- (c) What was the reason for the detention?
- (d) When they were detained, was there any complaint regarding the conditions of their confinement, including prison policies?
- (e) What was the specific complaint?
- (f) Was there any claimed injury as a result?

16. Have you or any member of your immediate family ever asserted any type of civil rights claim and/or violation of your civil rights? If so, answer the following:

- (a) What was the specific complaint?
- (b) Who did you or they complain to?
- (c) What was the outcome of the claim?

17. Have you or any member of your immediate family ever been charged with a crime involving the use or possession of illegal drugs?

18. Would any personal experiences prevent you from being fair to both sides in a case involving a death at a detention facility?

19. Is any member of the jury panel related to any other member of the jury panel? If so, would this person have undue influence over your opinion of this matter?

20. Have you or any member of your family, to your knowledge, ever had a bad experience

with a law enforcement and/or detention officer or corrections officer?

21. Is there any member of the jury panel who has ever been fired or terminated from employment with any detention facility, corrections facility or law enforcement agency?

22. Is there any member of the jury panel who, for any reason, whether asked or not, feels that he or she could not be fair and impartial in this case if chosen as a juror?

Respectfully submitted,

s/ Russell W. Harter, Jr.  
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February 6, 2020